

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

VICKY MONGRUT,

CASE NO: 9:22-CV-80678-RAR

Plaintiff,

vs.

SOUTHERN AIRWAYS
EXPRESS LLC,
A Foreign Limited Liability Company,

Defendant.

/

NOTICE OF FILING REPLY TO STATEMENT OF CLAIM

Defendant, SOUTHERN AIRWAYS EXPRESS LLC (“SAE”), pursuant to this Court’s Order Setting FLSA Schedule (ECF 13), respond to the Plaintiff’s Amended Statement of Claim filed on July 21, 2022 (ECF 20), as follows:

RESPONSE TO STATEMENT OF CLAIM

Plaintiff claims that while employed by SAE, she was a salary-paid employee and was non-exempt under Fair Labor Standard Act (“FLSA”) and is therefore entitled to be paid overtime. Plaintiff claims she is owed \$15,159.75 (unliquidated) and if liquidated \$30,319.50 in damages not including attorney’s fees. Defendant denies Plaintiff is entitled to overtime pay. Plaintiff was an exempt employee and therefore did not qualify for overtime. Plaintiff typically worked 40 hours a week. Plaintiff was not required to clock in and out because she was exempt and therefore, Defendant does not have any time sheets. Defendant shall provide Plaintiff with the required payroll records.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of July, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: *s/ Romin N. Currier*
Romin N. Currier
Florida Bar No. 566985

SERVICE LIST

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Trial Counsel for Plaintiff

All counsel of record has been served with this document via Notice of Electronic Filing generated by the CM/ECF.